

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE DISTRICT OF DELAWARE**

In re:

CHRISTMAS TREE SHOPS, LLC, *et al.*,¹

Debtors.

GEORGE L. MILLER, in his capacity as Chapter
7 Trustee of CHRISTMAS TREE SHOPS, LLC
et al.,

Plaintiff,

vs.

TEKSYSTEMS GLOBAL SERVICES, LLC,

Defendant.

Chapter 7

Case No. 23-10576 (TMH)

(Jointly Administered)

Adv. Proc. No. 25-50876 (TMH)

**STIPULATION FOR EXTENSION OF TIME FOR DEFENDANT TO
ANSWER OR OTHERWISE RESPOND TO THE COMPLAINT**

Plaintiff, George L. Miller in his capacity as chapter 7 trustee of Christmas Tree Shops, LLC, *et al.*, (the “Plaintiff”), for the estates of the above-captioned debtors (the “Debtors”) in the above-captioned cases pending under chapter 7 of title 11 of the United States Code (the “Bankruptcy Code”), by and through his undersigned counsel and defendant TEKsystems Global Services, LLC (the “Defendant,” and together with Plaintiff, the “Parties”), enter into this *Stipulation for Extension of Time for Defendant to Answer or Otherwise Respond to the Complaint* (the “Stipulation”) and hereby stipulate and agree as follows:

¹ The Debtors in these chapter 7 cases and the last four digits of each Debtor’s U.S. tax identification number are as follows: Christmas Tree Shops, LLC (1207), Handil, LLC (1150), Handil Holdings, LLC (2891), Salkovitz Family Trust 2, LLC (8773), and Nantucket Distributing Co., LLC (1640).

1. The Parties agree and stipulate that the time within which the Defendant may answer or otherwise respond to the *Complaint* [D.I. 1] in the above-captioned adversary proceeding is hereby extended to and including July 24, 2025.

2. Except as specifically set forth herein, the Parties reserve all of their respective rights in this matter.

Dated: June 4, 2025

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PACHULSKI STANG ZIEHL & JONES LLP

SHOOK, HARDY & BACON L.L.P.

/s/ Peter J. Keane

/s/ Mark Moedritzer

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Counsel to Defendant

*Counsel to Plaintiff George L. Miller, Chapter 7
Trustee of Christmas Tree Shops, LLC, et al.*